



Henry E. Mazurek
Partner
Direct (212) 655-3594
Fax (212) 655-3535
hem@msf-law.com

April 18, 2024

Via ECF

The Honorable William F. Kuntz, II
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Motovich et al.*, 21-CR-497 (WFK)

Dear Judge Kuntz:

We represent defendant David Motovich in the above-referenced matter. We write to respectfully request a temporary modification to Mr. Motovich's conditions of pretrial release to permit him to join his son at a birthday dinner with his immediate family at a local restaurant in Manhattan on April 21, 2024.

We have conferred with Pretrial Services and counsel for the government, both of whom have no objection to Mr. Motovich's request. We have also provided specific details of the event to Pretrial Services directly.

Respectfully submitted,

/s/ HEM
Henry E. Mazurek
Counsel for Mr. David Motovich

cc: Counsel of record (*by ECF*)
Pretrial Services Officer Christian Berzak (*by email*)